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Attorney for Richard J. Chase

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

RICHARD J. CHASE,

Defendant.

Case Nos. 2:18-cr-00250-JCM-NJK
2:16-CR-171-GMN-CWH
2:10-CR-00568-GMN-PAL

**STIPULATION TO CONTINUE
SENTENCING HEARING
(First Request)**

It is stipulated and agreed to by Federal Public Defender Rene L. Valladares and Assistant Federal Public Defender Sylvia A. Irvin, counsel for Richard J. Chase, and United States Attorney Dayle Elieson and Assistant United States Attorney Daniel Cowhig, counsel for the United States of America, that the Sentencing and Revocation Hearing currently scheduled on January 11, 2019, at 10:00 a.m., be vacated and continued to March 15, 2019, at 10:00 a.m. or to a date and time convenient to the Court, but no sooner than sixty (60) days.

This Stipulation is entered into for the following reasons:

1. This is a joint request by counsel for the Government and counsel for the Defendant Richard J. Chase.

1 2. The additional time requested by this Stipulation is reasonable pursuant to
2 Federal Rule of Criminal Procedure 32(b)(2), which states that the “court may, for good cause,
3 change any time limits prescribed in this rule.”

4 3. Both counsel request this additional time in order to allow adequate time to
5 research sentencing issues, file sentencing objections and memoranda, and to prepare for the
6 sentencing hearing.

7 4. The defendant is in custody and agrees with the need for the continuance.

8 5. The parties agree to the continuance.

9 This is the first request for a continuance of the sentencing hearing.

10 DATED this 8th day of January, 2019.

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12 RENE L. VALLADARES
13 Federal Public Defender

DAYLE ELIESON
United States Attorney

14 By Sylvia A. Irvin
15 SYLVIA A. IRVIN
16 Assistant Federal Public Defender

By Daniel J. Cowhig
DANIEL J. COWHIG
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
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ORDER

RICHARD J. CHASE

Defendant.

IT IS ORDERED that the Sentencing and Revocation Hearing currently scheduled for Friday, January 11, 2019, at 10:00 a.m., be vacated and continued to March 15, 2019 at the hour of 10:00 a.m.

DATED January 9, 2019.

UNITED STATES DISTRICT JUDGE